

EXHIBIT J

Greg Bennett

From: Greg Bennett
Sent: Tuesday, March 15, 2022 7:14 PM
To: Alexandra Harwin
Cc: Hillary Raimondi; Laurent S. Drogin; Brittany K. Lazzaro; Kate MacMullin; Annie Sloan
Subject: RE: Robinson v. De Niro et al. -- Follow-Up re Interview Request

Ali,

Please let us know if you will make plaintiff available to appear for a zoom-conducted examination by defendants' vocational rehabilitation expert witness tomorrow or Thursday. It is anticipated that the examination would last between 2-3 hours maximum, and would involve only the expert and plaintiff. The topics for this planned examination include those identified in, and otherwise related to, the expert report from plaintiff's vocational rehab witness.

In addition to the above, defendants' economist and vocational rehabilitation expert witnesses have informed counsel that they need additional time in light of the unique nature of plaintiff's allegations as they relate to her alleged economic losses, as well as the volume of data that they believe is necessary to review in order to finalize their reports. Thus, defendants intend to seek an extension of time for those experts to disclose their reports, up to April 8. Should plaintiff consent, defendants' vocational rehabilitation witness would be amenable to postponing his examination of plaintiff until early next week.

In addition to the above, please let us know if you will make plaintiff available to appear for a zoom-conducted forensic psychiatric examination by defendants' psychiatric expert witness. It is anticipated that the examination would last between 7-8 hours maximum, and would involve only the expert and plaintiff.

Defendants intend to seek the above relief by petitioning Judge Parker, to the extent plaintiff doesn't consent, in whole or in part. Thus, please advise as to the reasons plaintiff disagrees, if applicable, before noon tomorrow.

Thanks –

Greg

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From: Alexandra Harwin <aharwin@sanfordheisler.com>
Sent: Sunday, March 13, 2022 10:24 PM
To: Greg Bennett <GBennett@tlsslaw.com>

Cc: Hillary Raimondi <hramondi@tlsslaw.com>; Laurent S. Drogin <LDrogin@tarterkrinsky.com>; Brittany K. Lazzaro <blazzaro@tarterkrinsky.com>; Kate MacMullin <kmacmullin@sanfordheisler.com>; Annie Sloan <ASloan@sanfordheisler.com>

Subject: Robinson v. De Niro et al. -- Follow-Up re Interview Request

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Greg,

Can you clarify what it is that Defendants are seeking with respect to an interview with Plaintiff, including who would conduct and attend the interview, how long would it last, and what topics would it cover?

We look forward to hearing back from you, and we wish you a happy birthday in the meanwhile!

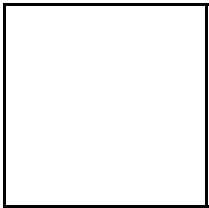
Best,
Ali

Alexandra Harwin (she/her/hers)

Partner and Executive Chair of the Discrimination and Harassment Practice Group, [bio](#)

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